

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GEOTAG, INC.,

Plaintiff,

v.

**7-ELEVEN, INC.; SEVEN & I
HOLDINGS CO., LTD.; SEVEN-
ELEVEN JAPAN CO., LTD.,**

Defendants.

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C.A. NO. 2:11-cv-00424-MHS

JURY TRIAL DEMANDED

7-ELEVEN, INC.'S MOTION TO STAY

Defendant 7-Eleven, Inc. ("7-Eleven"), respectfully requests that the Court stay this action in favor of the Microsoft and Google declaratory judgment action in Delaware. Because this Stay request has been extensively brief in related actions, 7-Eleven incorporates the prior briefing, attached to Defendants' Motion to Stay in related action nos. 2:11-cv-00404-MHS (Dkt. No. 307) and 2:11-cv-00405-MHS (Dkt. No. 355), by reference. For substantially the reasons previously set forth in that briefing, 7-Eleven respectfully requests that the Court stay this action in favor of the Microsoft and Google declaratory judgment action in Delaware.

Dated: June 1, 2012

Respectfully submitted,

/s/ Ajeet P. Pai

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), Ajeet Pai, counsel for Defendant 7-Eleven, Inc. conferred by telephone with Chris Joe, counsel for Plaintiff Geotag, Inc., on June 1, 2012. For substantially the reasons set forth in prior briefing, the parties are at an impasse and this motion is opposed.

/s/ Ajeet P. Pai

Ajeet P. Pai

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on June 1, 2012. Any other counsel of record will be served by first class mail on this same date.

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/s/ Ajeet P. Pai